

PRIVACY NOTICE

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Issue Date: 31/10/2023
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Change History Record

Issue	Description of Change	Approval	Date of Issue
0.1	Initial draft for comment.		31/10/23
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1. Who we are?

HKM22 Limited is the limited company for Heather McLellan, providing mentoring, coaching, speaking and consulting services regarding return to work after illness or injury.

This privacy notice explains how we use any personal information we collect about you when you use our services and this website.

HKM22 is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our services and this website, then you can be assured that it will only be used in accordance with this privacy notice.

2. What information do we collect about you?

We collect, process and retain personal information about you only when you:

- submit your information to us using the “Contact Us” form
- directly contact us (email, website or telephone)
- opt-in to our newsletter
- provide us with your business card or contact information in connection with business services

This information can include:

- name
- phone number
- email address
- client location
- visiting IP address

Unless a person voluntarily submits personal data to us (for example, by sending us an email or completing the contact form), we cannot personally identify an individual.

We use the information only for the purpose you provided to us.

It may include:

- responding to your request
- sending out e-newsletters
- providing you with services.

3. How will we use the information about you?

We collect information about you to process your enquiry or manage the service we provide for you.

We will process (collect, store and use) the information you provide in a manner compatible with the UK’s General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it longer than is necessary.

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This is what we do for the following:

- **Prospects:** We use your personal information to respond to any general enquiries you may have made to us via our contact us form, email, telephone or any other method of communication. We will use this information to follow-up your enquiry.
- **Clients & Mentees:** We use your personal information so that we can deliver the service(s) you or your referrer have contracted us to deliver for you. This may include providing vocational rehabilitation, mentoring or coaching services, speaking services or consultancy.
- **Contractors & Associates:** We use your personal information to process your payments for services provided, and to manage your service performance.
- **Job Applicants:** We use your personal information to assess your suitability for the role you have applied for and potentially shortlist you for the job role. All the information you provide to us will only be used for progressing your job application, or to fulfil legal or regulatory requirements if necessary.
- **Website Visitors:** We use your information collected from the website to personalise your repeat visits to our website. HKM22 will not share your information for marketing purposes with any other company.

4. Our legal grounds for processing your information

We may rely on one or more of the following legal grounds to process your personal information:

- **Contract:** Article 6(1)(b) of the GDPR, which relates to the processing necessary to perform a contract or to take steps at your request, before entering a contract. We will use this if you become a client, mentee, contractor or associate.
- **Consent:** Article 6(1)(a) of the GDPR, which relies on your freely-given consent at the time you provide your personal information to us. We will always make it clear what your information will be used for and provide a link to our privacy policy and the ability to opt out of communications. We will use this when you sign-up to our e-newsletters.
- **Legitimate Interests:** Article 6(1)(f) of the GDPR, which relates to our legitimate interests communicating with our clients, prospects and mentees to introduce them to services, or market similar services that may be of interest and benefit to them.

5. Where we store your information?

We store personal data in digital format on secure cloud servers and systems hosted in the European Union (EU) and the United States (US). Where data is stored on servers located in the US, we rely on the Privacy Shield Framework to transfer this information. Access to personal data is highly restricted internally for approved business purposes only.

Any personal data collected in paper form (e.g. contracts, feedback forms, business cards, etc.) are securely filed at our office location in the UK, or are transferred to electronic record systems and then securely destroyed.

6. How long do we keep your information?

We have data retention policies and procedures designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of your personal information. Personal information that we process for any purpose or purposes will not be kept for longer than is necessary.

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We may, however, retain personal information for an additional period as is permitted or required under applicable laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

For a copy of our data retention schedule email our **Data Compliance Manager** at heather@hkm22.com.

7. Keeping personal data secure and disclosing your information

Transmitting information over the internet is generally not completely secure. We have procedures and security in place to keep personal data secure once it is in our systems.

We will not share personal information with any third party organisation for market research, marketing, or commercial purposes without specific consent from the user.

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do so. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

However, we may share information (including personal information) if we have a legal obligation to do so, or if we have to enforce or apply our terms of use and other agreements. This may include submitting information for legal reasons.

7.1. e-newsletters and Mailing Lists

As part of the registration process for our e-newsletter, we collect personal information. We use that information to send you e-newsletters about our company. We don't rent or sell email lists with other organisations and businesses.

We use a third party provider, GetResponse to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see the [GetResponse privacy notice](#). You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails.

7.2. CRM

As part of our process for you to request a call back from us we use a third party CRM (customer relationship management) provider, Hubspot to hold the information you share with us, so we can call you back. For more information, please see [Hubspot's privacy notice](#). You have the right for us to erase your contact details from our system by emailing our [Data Compliance Manager](#).

8. Access to your information and correction

You have the right at any time to:

- Ask for a copy of the information about you held by us in our records
- Ask us to correct any inaccuracies in your information
- Make a request to us to delete what personal data of yours we hold
- Object to receiving any marketing communications from us.

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Please make any of the requests outlined above by contacting our **Data Compliance Manager** by email heather@hkm22.com or in writing at HKM22 Limited, 9 Jacksons Ley, Middleton, Wirksworth, Nr Matlock, Derbyshire, DE4 4NX.

In the event that you wish to complain about how we have handled your personal data, please contact the **Data Compliance Manager** by email at heather@hkm22.com or in writing at HKM22 Limited, 9 Jacksons Ley, Middleton, Wirksworth, Nr Matlock, Derbyshire, DE4 4NX. Our **Data Compliance Manager** will then look into your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact the Information Commissioner's Office in the UK here: <https://ico.org.uk/concerns/> and file a complaint with them.

9. Children's privacy

Our Service does not address and is not directed towards anyone under the age of 16. We do not knowingly collect personal information from anyone under the age of 16. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our systems.

10. Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

11. Other websites

Our website contains links to other websites. This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

12. Changes to our privacy notice

We keep our privacy notice under regular review and we will place any updates on this web page. This privacy notice was last updated on 31st October 2023.

HKM22 is a registered Data Controller with the Information Commissioner's Office (ICO).

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13.How to contact us

Please contact us if you have any questions about our privacy notice or information we hold about you, email us at heather@hkm22.com or write to:

Data Compliance Manager
HKM22 Limited
9 Jacksons Ley,
Middleton,
Wirksworth,
Nr Matlock,
Derbyshire,
DE4 4NX.